

**Before the
Federal Communications Commission
Washington, D.C. 20554**

| | | |
|------------------------------------|---|---------------------|
| In the matter of |) | |
| |) | |
| Developing a Unified Inter-carrier |) | CC Docket No. 01-92 |
| Compensation Regime |) | |

TO: The Federal Communications Commission

COMMENTS OF SINGAPORE TELECOMMUNICATIONS LIMITED

1. Singapore Telecommunications Limited (“SingTel”) hereby submits these comments in response to the Notice of Proposed Rulemaking (FCC 01-132) in the above captioned proceedings on reforms for domestic intercarrier compensation, released by the Federal Communications Commission (FCC).

2. SingTel would like to address the issue raised in paragraph 125 of the said Notice of Proposed Rulemaking, namely, whether the reforms proposed for domestic intercarrier compensation could be a useful substitute for the traditional international settlement systems for the exchange of international traffic between U.S. international carriers and foreign carriers.¹

3. SingTel submits that any reforms affecting international settlements arrangement should take into consideration the governing International Telecommunication Regulations² (ITR). Under the ITR, the provision and operation of international telecommunication services should be done by mutual agreement of the affected parties and any revision to the accounting rates should also be done by mutual consent of such parties. In the circumstances, the affected parties should be left to enter into such mutual agreements by themselves.

4. SingTel further submits that issues affecting international settlements arrangements, where non-U.S. parties are involved, should be addressed in the appropriate multilateral forum such as the International Telecommunications Union (ITU), instead of the FCC.

5. Finally, SingTel would like to point out that Bill-and-Keep Arrangements referred to in the Notice are already provided for in the ITU Recommendations. Specifically, ITU-T Recommendation D.150 on New System for Accounting in International Telephony lists the various options of remuneration for the exchange of international telephony traffic, **subject to bilateral agreement**. This Recommendation provides for international carriers to “agree not to exchange

¹ FCC 01-132 at ¶ 125

² International Telecommunications Regulations, Final Acts of the World Administrative Telegraph and Telephone Conference, Melbourne, 1988

international traffic accounts when, for example, the terminal countries' traffic levels in both directions are more or less equal.”

6. For the foregoing reasons, SingTel urges the FCC not to extend the proposed reforms to international settlements arrangements between U.S. international carriers and foreign carriers.

Respectfully submitted
Singapore Telecommunications Limited